

BEFORE THE  
POSTAL REGULATORY COMMISSION

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ANNUAL COMPLIANCE REVIEW, 2015

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: Docket No. ACR2015  
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UNITED PARCEL SERVICE, INC.'S NOTICE OF FILING  
ADDITIONAL CERTIFICATIONS OF COMPLIANCE WITH  
PROTECTIVE CONDITIONS IN CONNECTION WITH  
MOTIONS FOR ACCESS

January 19, 2016

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On January 11, 2016, United Parcel Service, Inc. ("UPS") requested access to a selection of non-public library references. Attached in Exhibit 1 are Certifications of Compliance with Protective Conditions for additional UPS consultants, Dan Luo and Weichen Zhao, both of whom are colleagues of Dr. Kevin Neels at The Brattle Group.<sup>1</sup> UPS respectfully requests that access be granted to these two additional consultants.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

By: /s/ Steig D. Olson

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***Attorney for UPS***

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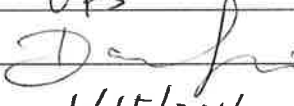
<sup>1</sup> In Order No. 3033 (Jan. 15, 2016), the Commission granted UPS's First Motion for Access for several other outside counsel and consultants.

# **Exhibit 1**

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as Commission Docket No. ACR2015 by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matters identified as Commission Docket Nos. ACR2015, RM2016-2, and any other docket to which the Commission grants me access. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	<u>Dan Luo</u>
Firm	<u>The Brattle Group</u>
Title	<u>Associate</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>1/15/2016</u>

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as Commission Docket No. ACR2015 by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matters identified as Commission Docket Nos. ACR2015, RM2016-2, and any other docket to which the Commission grants me access. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	<u>Weichen Zhao</u>
Firm	<u>Brattle Group</u>
Title	<u>Research Analyst</u>
Representing	<u>UPS</u>
Signature	<u>Weichen Zhao</u>
Date	<u>1/15/2016</u>